

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE COTE

UNITED STATES OF AMERICA

INDICTMENT

- v. -

WILLIAM HANOMAN,
SALVATORE LAURIA, and
JAMES HUTCHINSON,

Defendants.

COUNT ONE

(Conspiracy)

12 CRIM 161

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED FEB 17 2012

The Grand Jury charges:

1. From in or about June 2011 through in or about November 2011, in the Southern District of New York and elsewhere, WILLIAM HANOMAN, SALVATORE LAURIA and JAMES HUTCHINSON, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 1341 and 1344.

2. It was a part and an object of the conspiracy that WILLIAM HANOMAN, SALVATORE LAURIA and JAMES HUTCHINSON, the defendants, and others known and unknown, having devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent

pretenses, representations, and promises, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did take and receive from a private and commercial interstate carrier such matters and things.

3. It was a further part and an object of the conspiracy that WILLIAM HANOMAN, SALVATORE LAURIA and JAMES HUTCHINSON, the defendants, and others known and unknown, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations and promises.

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

(a) In June 2011, LAURIA deposited stolen checks into a bank account.

(b) In July 2011, LAURIA deposited stolen checks into a bank account.

(c) In August 2011, LAURIA deposited stolen checks into a bank account.

(d) In June 2011, HANOMAN deposited checks from an account controlled by LAURIA into a separate bank account.

(e) In July 2011, HANOMAN deposited checks from an account controlled by LAURIA into a separate bank account.

(f) In August 2011, HANOMAN deposited checks from an account controlled by LAURIA into a separate bank account.

(h) In June 2011, HUTCHINSON deposited stolen checks into a bank account.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Bank Fraud)

The Grand Jury further charges:

5. From at least in or about June 2011 up to and including in or about August 2011, in the Southern District of New York and elsewhere, WILLIAM HANOMAN, SALVATORE LAURIA and JAMES HUTCHINSON, the defendants, willfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, HANOMAN caused checks made out to a charitable organization to be stolen, and HANOMAN, LAURIA and HUTCHINSON

deposited those checks and the proceeds of those checks into bank accounts that they opened.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

(Bank Fraud)

The Grand Jury further charges:

6. From at least in or about June 2011 up to and including in or about August 2011, in the Southern District of New York and elsewhere, WILLIAM HANOMAN and JAMES HUTCHINSON, the defendants, willfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution and to obtain moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, HANOMAN caused checks made out to a business to be stolen, and HANOMAN and HUTCHINSON deposited those checks and the proceeds of those checks into bank accounts that they opened.

(Title 18, United States Code, Section 1344 and 2.)

COUNT FOUR

(Mail Fraud)

The Grand Jury further charges:

7. From at least in or about June 2011 up to and including in or about August 2011, in the Southern District of

New York and elsewhere, WILLIAM HANOMAN, the defendant, having devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, willfully and knowingly did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and took and received therefrom such matters and things, to wit, HANOMAN received checks in the mail that he knew had been stolen.

(Title 18, United States Code, Section 1341 and 2.)

FORFEITURE ALLEGATION

7. As the result of committing the offenses in violation of Title 18, United States Code, Sections 1349, 1344, and 1341 charged in Counts One through Four of this Indictment, WILLIAM HANOMAN, SALVATORE LAURIA and JAMES HUTCHINSON, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461, property constituting, and derived from, proceeds obtained directly and indirectly as the result of such violations, including but not limited to the following:

a. Over at least approximately \$66,867.79 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained by HANOMAN, LAURIA and HUTCHINSON as a result of the offense.

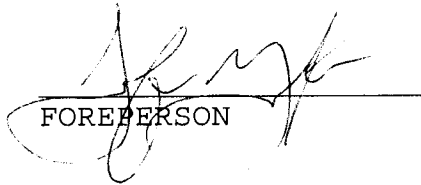
Substitute Asset Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

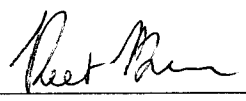
- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461.)



FOREPERSON



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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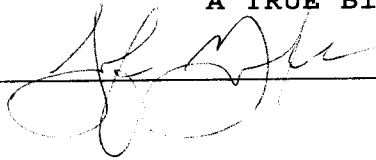
12 Cr.

(18 U.S.C. §§ 1349, 1344, 1341 and 2)

PREET BHARARA

United States Attorney.

A TRUE BILL



2/17/12
Foreperson.

2/17/12 - Filed Indictment. Case assigned to Judge Cote.
J. Gorenstein
U.S.M.J.